

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	CASE NO. 2:23-CR-0003
	:	JUDGE WATSON
v.	:	
	:	
	:	
PETROCELLI ROBERTSON,	:	
(a/k/a “Bible” a/k/a “Juice)	:	
	:	
Defendant.	:	

JOINT MOTION TO CONTINUE THE TRIAL DATE

Now come the parties, through their undersigned attorneys, and jointly submit this Joint Motion to Continue the Trial Date and associated deadlines listed in the scheduling Order, for a period of 60 to 90 days. A memorandum in support is attached.

Respectfully submitted,

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United States Attorney

s/ Samuel H. Shamansky
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MEMORANDUM IN SUPPORT

On January 10, 2023, the Grand Jury returned a three-count Indictment against Mr. Robertson charging him in Counts One and Two with Felon in Possession of a Firearm in violation of 18 U.S.C. § 922(g)(1); and Count Three with Possession with Intent to Distribute Fentanyl, Cocaine Base and Methamphetamine in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C). Trial is currently set for March 20, 2023. This is a second trial date set. There has been one previous motion to continue.

Defense has received two rounds of discovery and the parties have begun preliminary negotiations. Defense is currently reviewing the second round of discovery with Mr. Robertson and determining if any potential pretrial motions are necessary. The parties need additional time to continue to review the supplemental discovery and negotiate a possible resolution.

Counsel for all parties agree that this request is not made for the purpose of needless delay and that the interests of justice served by a continuance outweigh the interests of the public and of Petrocelli Robertson in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

Given these factors and others, the parties agree that a continuance is warranted under 18 U.S.C. §3161(h)(7)(A) for the reasons set forth in §3161(h)(7)(B)(i) and (iv). Mr. Robertson, who has been advised of this motion, hereby waives his right to a fast and speedy trial by the filing of this motion. Mr. Robertson acknowledges that any period of time resulting from a continuance will serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial. See 18 U.S.C. §3161(h)(7)(A). The parties further agree that any time associated with such a continuance would be excludable under 18 U.S.C. 3161(h)(7)(A)

For these reasons, the parties request a continuance of the trial schedule and associated deadlines for 60-90 days consistent with this motion.

Respectfully submitted,

KENNETH L. PARKER

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